

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
MARK E. FELGER (MF9985) JERROLD N. POSLUSNY (JP7140) COZEN O'CONNOR LibertyView, Suite 300 457 Haddonfield Road Cherry Hill, NJ 08002 (856) 910-5000 Proposed Attorneys for the Debtors	
In re:	Case No. 08-
SHAPES/ARCH HOLDINGS L.L.C., <u>et al.</u> ,	Judge:
Debtors.	Chapter: 11

**ORDER REGARDING APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY MATTERS**

The relief set forth on the following pages, numbered two (2) through four (4) is hereby ORDERED.

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Trenton Convalescent Center Urban Renewal Associates, L.P. and Trenton Convalescent Center Operating Company, L.P.

Case No: 07-

Order Regarding Application for Expedited Consideration of First Day Matters

These bankruptcy cases were filed on March 16, 2008. An Application for Expedited Consideration of First Day Matters was filed. After review of the initial pleadings filed in these cases which have been designated by counsel as requiring expedited consideration, and for good cause shown.

IT IS HEREBY ORDERED that the following motions are set down for hearing before the Honorable _____ in Courtroom # _____ located at _____ at the date and time as forth below:

- | | Hearing Date and Time |
|---|-----------------------|
| 1. VERIFIED MOTION FOR AN ORDER DIRECTING JOINT ADMINISTRATION AND PROCEDURAL CONSOLIDATION. | _____ at _____M |
| 2. APPLICATION FOR DESIGNATION AS COMPLEX CHAPTER 11 CASES. | _____ at _____M |
| 3. VERIFIED MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS (I) AUTHORIZING AND APPROVING POSTPETITION FINANCING; (II) GRANTING LIENS AND SECURITY INTERESTS AND PROVIDING SUPERPRIORITY ADMINISTRATIVE EXPENSE STATUS; (III) MODIFYING AUTOMATIC STAY; AND (IV) SCHEDULING FINAL HEARING, PURSUANT TO SECTIONS 105, 362, 363 AND 364 OF THE BANKRUPTCY CODE AND FEDERAL RULES OF BANKRUPTCY PROCEDURE 2002 AND 4001(c) AND (d). | _____ at _____M |
| 4. VERIFIED MOTION FOR AN ORDER AUTHORIZING THE DEBTORS TO MAINTAIN CURRENT BANK ACCOUNTS, MAINTAIN THEIR PRE-PETITION CASH MANAGEMENT SYSTEM, AND USE EXISTING BUSINESS FORMS. | _____ at _____M |

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5. DEBTORS' VERIFIED MOTION FOR AN ORDER AUTHORIZING BUT NOT DIRECTING PAYMENT OF PRE-PETITION WAGES, SALARIES, COMPENSATION, EMPLOYEE BENEFITS, BUSINESS REIMBURSEMENT EXPENSES, CERTAIN UNION PAYMENTS, AND THE CONTINUATION OF THE DEBTORS' WORKERS' COMPENSATION PROGRAM AND POLICIES PURSUANT TO 11 U.S.C. §§ 105(a), 507(a)(4) AND (5). _____ at _____M
6. VERIFIED MOTION FOR INTERIM AND FINAL ORDERS: (I) PROHIBITING UTILITY COMPANIES FROM DISCONTINUING, ALTERING OR REFUSING SERVICES; (II) DEEMING UTILITY COMPANIES TO HAVE ADEQUATE ASSURANCE OF PAYMENT; AND (III) ESTABLISHING PROCEDURES FOR DETERMINING REQUESTS FOR ADDITIONAL ASSURANCE PURSUANT TO 11 U.S.C. § 366. _____ at _____M
7. VERIFIED MOTION FOR AN ORDER AUTHORIZING THE DEBTORS TO PAY PRE-PETITION SALES AND USE TAXES. _____ at _____M
8. APPLICATION FOR RETENTION OF EPIQ BANKRUPTCY SOLUTIONS, LLC, AS OFFICIAL NOTICING, CLAIMS AND/OR SOLICITATION AND BALLOTING AGENT FOR THE DEBTORS. _____ at _____M
9. DEBTORS' VERIFIED MOTION FOR AN ORDER ESTABLISHING A BAR DATE PURSUANT TO FED. R. BANKR. P. 2002(a)(7) AND 3003(c)(3). _____ at _____M
10. MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 105(a) AND 331 ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS. _____ at _____M

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11. DEBTORS' MOTION TO: (I) TO CONFIRM GRANT OF ADMINISTRATIVE EXPENSE STATUS TO OBLIGATIONS ARISING FROM POSTPETITION DELIVERY OF GOODS, (II) ESTABLISH AUTHORITY TO PAY CERTAIN EXPENSES IN THE ORDINARY COURSE OF BUSINESS AND (III) PROHIBIT THIRD PARTIES FROM INTERFERING WITH DELIVERY OF GOODS.

_____ at _____M

IT IS FURTHER ORDERED, that service of the within Order shall be made by facsimile or electronic mail upon: (1) counsel for the Lender Group (as defined in the motions), (2) counsel for Versa (as defined in the Motions), (3) the Office of the United States Trustee, (4) the Internal Revenue Service, (5) the New Jersey Attorney General, (6) the Commonwealth of Pennsylvania Department of Revenue, and (7) the Debtors' consolidated list of top 30 unsecured creditors (but no less than the five largest unsecured creditors from each case).

IT IS FURTHER ORDERED that the Debtors' notice of the motions made by facsimile or electronic mail was good and sufficient under the circumstances of these cases.

IT IS FURTHER ORDERED, that objections and/or responses to the First Day Matters, if any, shall be made in accordance with the Court's General Order Adopting Guidelines Governing First Day Matters.

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